

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

Carl Jones	)	
	)	
Plaintiff,	)	
v.	)	Case No.: 3:22-cv-50299
	)	Honorable Iain D. Johnston
K.E. Ehrke, et al.,	)	Honorable Margaret J. Schneider
	)	
Defendants.	)	
	)	
	)	
	)	

**JOINT STATUS REPORT**

Pursuant to the Court’s Order dated July 14, 2025 [**DOC 96**], the Parties, by and through their undersigned attorneys, respectfully submit this Joint Status Report and state as follows:

**1. Status of Plaintiff’s DeKalb County Criminal Cases**

On August 5, 2025, the DeKalb County Circuit Court held a status hearing on Plaintiff’s two pending criminal cases, DeKalb County case nos. 2022-CF-287 and 2022-CF-288 (the “DeKalb County Criminal Cases”).

In connection with the August 5, 2025, status hearing, the DeKalb County Circuit Court entered an Order for Continuance for both of the DeKalb County Criminal Cases, setting a status hearing for both cases on September 17, 2025. However, no trial date has been set for either of the DeKalb County Criminal Cases, which remain pending at this time.

Docket sheets for both DeKalb County Criminal Cases (current as of August 11, 2025) are filed herewith as **Exhibits A-B** to this Joint Status Report.

## 2. Status of Discovery

Defendants have requested Plaintiff's execution of an authorization for release of mental health-related records from Elgin Mental Health Center (pursuant to the Illinois Mental Health and Developmental Disabilities Confidentiality Act, 740 ILCS 110/1, et seq.). Counsel for the Parties have conferred and agreed to further discuss and determine a mutually agreeable scope and extent of mental health-related records that Plaintiff will authorize for release to Defendants.

Plaintiff has requested additional body-worn and squad car video files from Defendants, and the Parties will confer regarding the specific additional video files requested.

Plaintiff maintains his objection to proceeding with his deposition in the present case, as requested by Defendants, on the basis of the risk of potential prejudice which may impact the trial of the pending DeKalb County Criminal Cases.

Based on the limitations imposed on furtherance of the discovery process in, and litigation of, the present case, the Parties have filed an Agreed Motion Requesting that this Court Stay Further Civil Litigation Due to Plaintiff's Ongoing State Court Criminal Proceedings or, in the Alternative, to Extend the Discovery Deadline [DOC 97] in the present case, as Plaintiff's claims in this civil action may raise constitutional matters that will be at issue in the DeKalb County Criminal Cases, and, any rulings with respect to Plaintiff's claims in the present action may interfere with the State Court criminal proceedings in DeKalb County Cases 2022CF287 and 2022CF288.

Dated: August 11, 2025.

Respectfully submitted,

By: /s/ Justin L. Weisberg  
Justin L. Weisberg  
Buchalter  
180 N. LaSalle Street, Ste. 3300  
Chicago, IL 60601  
[jweisberg@Buchalter.com](mailto:jweisberg@Buchalter.com)

*Attorney for Plaintiff*

By: Christopher R. Henson  
Michael J. Victor  
Christopher R. Henson  
Madison N. Wynes  
IFMK Law, Ltd.  
650 Dundee Road, Ste. 475  
Northbrook, IL 60062  
[mvictor@ifmklaw.com](mailto:mvictor@ifmklaw.com)  
[chenson@ifmklaw.com](mailto:chenson@ifmklaw.com)  
[mwynes@ifmklaw.com](mailto:mwynes@ifmklaw.com)

*Attorneys for Defendants*